

**REMARKS**

Applicant wishes to thank Examiner McClain for the courtesy of a telephone conference wherein a request for a telephone interview was made. A brief description of the present invention having a removable banknote storing unit without requiring a power source was described along with the provision of optical guides that could complete an optical circuit with the light emitting elements and the light receiving elements positioned and electronically connected only in the banknote receiving unit into which the banknote storing unit could be removably positioned.

As a result, relatively inexpensive and sturdy optical units can be positioned in a banknote storing unit and can be relatively easily cleaned. Their light receiving surfaces and light transmitting surfaces are positioned on the surface of the banknote storing unit.

There was no discussion of the claims nor the prior art.

The Office Action raised issues under 35 U.S.C. §112 which are believed to be addressed by the current amendments to the claims.

Additionally, applicant's co-pending European application has now been allowed as European patent EP 1467325. Applicant presents the allowed claim as the attached new Claim 30.

The Office Action relied upon *Plesko* (U.S. Patent No. 5,624,017) as anticipating Claims 1-3, 6-14, 17-20, 22 and 24-29.

The Office Action further contended that if the *Plesko* reference had its removable banknote storing unit permanently attached and that would in fact be an anticipation of applicant's invention.

The Office Action relied upon the teaching of the *Plesko* reference with regards to Figure 10. As can be determined, light is transmitted linearly in a straight line from an LED member 2 through a light cylinder 142, to a photoreceptor 3 immediately adjacent the bill entrance slot.

An unauthorized third party could readily have access for insertion of an object or a wire to these elements since the validator module does not receive a banknote storing unit in such a manner that an optical guide provided in the banknote storing unit would be operatively associated with the active light emitting and light receiving elements in the banknote receiving unit or validator module of the *Plesko* disclosure. These features are set forth in our claims and are not anticipated by the cited reference.

The *Plesko* (U.S. Patent No. 5,624,017) recognized a desirability of having removable and sealable cassette stacker modules that were purportedly distinguishable from the prior art by their novel low power stacker bar mechanism. See Column 2, Lines 25-37. The operation of the stacker bars are shown in Figures 2A – 2E.

As can be seen, a validation sensor 6 was supplemented with a light emitting diode 2 and a phototransistor receiver 3, having a transparent light guide 141 (142). Referring to Figure 1, bills are submitted to the validation module 21 through the infeed guide 104 and are immediately subject to a magnetic reading by validation sensor 6 and also are subject to an emission of light from the LED 2 into a tubular light guide member 142, immediately before the magnetic sensor 6. On the opposite side of the infeed guide is a phototransistor receiver 3 to measure the light passing through the bill. See Column 8, Lines 40-58 and also Figure 5.

The actual banknote storing unit or stacker module 22 can be removably attached to only the other end of the validation module 21 and could not be part of any optical circuit.

The cassette stacker module is removable and can be sealed. See Column 2, Lines 28-29. A hinged lid 30 at the top is openable to permit access to the bills and has a seal or lock 32 to thereby prevent theft by the service person who can remove the cassette stacker 22 and replace it with a new one. See Column 6, Lines 46-67.

The validation module provides most of the electrical operating power and the mechanical power to operate the detachable stacker module 22. See Column 5, Lines 2-6. Additionally, the validation module 21 basically contains the most expensive parts including the electronics and at least one motor, and is contemplated to be permanently attached to the vending machine. See Column 7, Lines 33-44.

The cassette stacker 22 is contemplated to be built from low cost plastic parts and "may only contain a few inexpensive electronic parts such as a small stacker bar drive motor."

As can be readily determined, both the magnetic sensor 6 and photo receptive transistor 3 and the light guide 142 would be accessible by an intruder since it is immediately at the entrance of the validator module 21. These elements are not contained in the banknote stacker unit 22 as shown in Figures 1 and 5.

As noted in Column 9, Lines 55-67, any cleaning and the servicing of the magnetic head sensors and optical components is only performed by removing a currency validator module from the machine and replacing it with a new one.

The actual operation of the optical components including the light guide 142 relied upon in the Office Action rejection is described in Column 11, Lines 19-52 and shown in Figure 10. This operation simply provides a linear transmission of light from an LED 2 into a cylindrical light guide 142 which is then truncated into a slit, at a narrow top end 192 to spread the light across the bill guide 104 to be received by the photo detector 3.

As can be readily appreciated, the active generation of light from the LED 2 is on one side of the bill guide channel and the photo detector 3 is on the other side so that variation in light can be turned into optical analog signals.

In summary, the *Plesko* disclosure recognizes a desirability of removable bill stackers which can be connected at one end of a validation module. The bills that enter through an input guide are immediately subject to both the magnetic and optical sensing. The validation module is operable without the bill stacker modules and the bills can simply be dropped in a bin.

Referring to the current claims, Claim 1 describes our banknote storing unit being removably positioned within the banknote receiving unit, as can be seen from Figure 1 and Figure 3 of our drawings. In this relationship, our optical guide units can be passively mounted so that they are on the surface of a banknote storing unit 16 as shown in Figure 1. See the optical guide unit 124, Page 17, Paragraph 71, receiving optical guide 208, Paragraph 0075, receiving optical guide 248 and receiving optical guide 288. The surface positions of these optical members can be conveniently made from appropriate plastic and can be easily cleanable on the upper surface of the banknote storing unit 16.

As seen in Figures 5-9, light emitting elements, for example 145 and light receiving elements 147, can provide a light translating effect to provide appropriate signals to determine the operability of our banknote storing unit when mounted within the banknote receiving unit. These features are set forth in our current claims and more than adequately distinguish over the cited reference.

Applicant would appreciate the courtesy of a telephone conference on this matter and a request for a formal telephone interview is attached hereto.

Very truly yours,

**SNELL & WILMER L.L.P.**



---

Joseph W. Price  
Registration No. 25,124  
600 Anton Boulevard, Suite 1400  
Costa Mesa, California 92626-7689  
Telephone: (714) 427-7420  
Facsimile: (714) 427-7799